

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

In re:	*	
	*	Case No. 16-10881-RGM
GARY L. JACOBS	*	
	*	Chapter 13
Debtor	*	

MOTION TO EXTEND AUTOMATIC STAY

COMES NOW Gary L. Jacobs, the Debtor, through undersigned counsel, and respectfully move this Court, pursuant to 11 U.S.C. § 362(c)(3)(B), for an order continuing the automatic stay as to the Debtor as provided under § 362(a). This request is being made as to all creditors in this case. In support of this motion, the Debtor states as follows:

1. This case was commenced by the filing of a voluntary petition under Chapter 13 of the Bankruptcy Code with the Clerk of this Court on March 11, 2016.
2. The Debtors had previously filed a Chapter 13 case that was dismissed on September 15, 2015.
3. This case was dismissed because an amended plan was not filed within 21 days of the Order denying Confirmation entered on August 24, 2015
4. Debtor alleges that this was because his previous attorney refused to perform any further work due to a fee dispute.
5. The petition in this case has been filed in good faith. The debtors believe that the Chapter 13 plan they have submitted will be confirmed and that they will be able to fully perform under the terms of the plan.

6. The Debtor's prior Chapter 13 case dismissed on September 15, 2015 was his only previous case that was pending during the preceding year.

WHEREFORE, the Debtor prays:

A. That this Court continue, as to the Debtor, the automatic stay under § 362(a) as to all creditors for the duration of this Chapter 13 proceeding, or until such time as the stay is terminated under § 362(c)(1) or (c)(2), or a motion for relief is granted under § 362(d);

B. That the stay in any event be deemed continued as to "all property of this estate" in bankruptcy;

C. That the Debtor has such other and further relief as to the Court may be just an proper; and

Respectfully submitted this 22nd day of March, 2016.

/s/ Jeremy C. Huang
Jeremy C. Huang, VSB 76861
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 22nd day of March, 2016, a copy of the foregoing Motion and Notice of Hearing were served via first class mail, postage prepaid, or the Court's ECF system, upon the Chapter 13 Trustee, U.S. Trustee, and the following parties:

American Financial Res Inc.
PO Box 5914
Santa Rosa, CA 95402-0000

Comcast
8029 Corporate Dr
Nottingham, MD 21236-4977

Commonwealth of Virginia
Dept of Taxation
Po Box 1115
Richmond, VA 23218-1115

Credit Collection Services
Two Wells Ave
Newton Center, MA 02459-0000

Credit One Bank
PO Box 98875
Las Vegas, NV 89193-0000

Dominion Virginia Power
PO Box 26666
Richmond, VA 23261-6666

Harley Davidson Credit Corp
PO Box 9013
Addison, TX 75001-0000

Internal Revenue Service
400 N. 8th Street, Box 75
Stop Room 898
Richmond, VA 23219-0000

IPFS Corporation
PO Box 412086
Kansas City, MO 64141-2086

JLB Associates, Inc.
c/o Robert B. Goodall
1259 Courthouse Rd., Suite 101
Stafford, VA 22554-0000

Kubota Credit Corp
1025 Northbrook Parkway
Suwanee, GA 30024-0000

Lisa A. Vellejos
6 Bryant Blvd
Stafford, VA 22556-0000

Matco Tools
Attn: Carrie
4403 Allen Rd
Stow, OH 44224-0000

Sheffield Financial
PO Box 1704
Clemmons, NC 27012-0000

Snap On Credit
Attn: Bankruptcy
950 Technology Way, Suite 301
Libertyville, IL 60048-0000

/s/ Jeremy C. Huang